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16 UNITED STATES DISTRICT COURT
17 EASTERN DISTRICT OF CALIFORNIA
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19 TRIA YANG,
20 Plaintiff,
21 v.
22 KILOLO KIJAKAZI,
23 Acting Commissioner of Social Security,¹
24 Defendant.

25 No. 1:20-cv-01353-AWI-BAM

26 STIPULATED MOTION AND ORDER FOR
27 AN EXTENSION OF TIME TO RESPOND TO
28 PLAINTIFF'S OPENING BRIEF

19 IT IS HEREBY STIPULATED, by and between the parties through their respective
20 counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's
21 Opening Brief be extended thirty (30) days from December 13, 2021, to January 12, 2022. This
22 is Defendant's first request for an extension. Counsel for Plaintiff has no objection to
23 Defendant's request for an extension.

25 _____
26 ¹ Kilolo Kijakazi became the Acting Commissioner of Social Security on July 9, 2021. Pursuant
27 to Rule 25(d) of the Federal Rules of Civil Procedure, Kilolo Kijakazi should be substituted,
therefore, for Andrew Saul as the defendant in this suit. No further action need be taken to
continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42
U.S.C. § 405(g).

1 Good cause exists for this request. Defendant respectfully requests this additional time
2 because Counsel for Defendant has been unable to devote the time required to complete
3 Defendant's response to Plaintiff's Opening Brief. The undersigned attorney has recently been
4 out on leave due to the birth of his second child and will be out on paternity leave until the first
5 week in January. As this Court no doubt knows, Social Security case filings in federal court
6 increased significantly in the past year. The increased filings, compounded by COVID-related
7 delays in transcript production and attorney attrition, have resulted in an increased workload and
8 competing deadlines. An extension until January 12, 2022 should give sufficient time for
9 Counsel for Defendant to complete the response to Plaintiff's Opening Brief. Counsel apologizes
10 to the Court for any inconvenience caused by this delay. All other dates in the Court's
11 Scheduling Order shall be extended accordingly.

Respectfully submitted,

PHILLIP A. TALBERT
Acting United States Attorney

DATE: December 13, 2021

By: s/ Oscar Gonzalez de Llano
OSCAR GONZALEZ DE LLANO
Special Assistant United States Attorney
Attorneys for Defendant

Respectfully submitted,

Attorneys for Plaintiff

DATE: December 13, 2021

By: /s/ Jonathan Omar Pena *
JONATHAN OMAR PENA
(*as authorized by email)

ORDER

Pursuant to the parties' request, and for good cause shown, IT IS SO ORDERED that Defendant shall have an extension, up to and including January 12, 2022, to respond to Plaintiff's Opening Brief. All other dates in the Court's Scheduling Order (Doc. No. 5.) shall be extended accordingly.

IT IS SO ORDERED.

Dated: December 14, 2021

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE